

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re:

Scott W. Charmoli and  
Lynne M. Charmoli,  
Debtors.

Case No. 22-24358-gmh  
Chapter 11 (Subchapter V)

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FIRST INTERIM APPLICATION FOR ALLOWANCE  
OF FEES AND COSTS BY SIESENNOP & SULLIVAN, LLP

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Siesennop & Sullivan, LLP ("S&S") submits this First Interim Application for Allowance of Fees and Costs by Siesennop & Sullivan, LLP (the "First Interim Fee Application"), pursuant to 11 U.S.C. §§ 330 and 331, Fed. R. Bankr. P. 2016, and Local R. 2016. In support of its First Interim Fee Application, S&S states as follows:

**Jurisdiction**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 and 157(a) and the Order of Reference entered in the Eastern District of Wisconsin. As a matter concerning the administration of the estate, this is a core proceeding in which the Court may enter final orders. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

**Background**

2. On October 3, 2022 (the "Petition Date"), Scott W. Charmoli and Lynne M. Charmoli (the "Debtors") filed a petition for relief under subchapter V of chapter 11 of the Bankruptcy Code. In accordance with 11 U.S.C. § 1184, the Debtors have remained in possession of their property and operated their affairs as debtors in possession.

3. On the Petition Date, the Debtor filed an application to employ S&S as special counsel to the Debtors (the "Retention Application"). (ECF No. 8.) On October 26, 2022, the

Court entered an order granting the Retention Application and approving the Debtor's employment of S&S (the "Retention Order"). (ECF No. 45.)

4. In accordance with the Retention Application and the Retention Order, S&S is to be reasonably compensated for its services on an hourly basis and is to be reimbursed for actual and necessary out-of-pocket expenses.

#### **First Interim Fee Period Request**

5. S&S rendered services on behalf of the Debtors from October 3, 2022 through January 31, 2023 (the "First Interim Fee Period"). The regular hourly rates for attorneys and paraprofessionals S&S who performed work on this case ranged from \$80.00 to \$240.00 per hour. During the First Interim Fee Period, S&S attorneys and paraprofessionals expended 118.60 hours on this case. Based upon the hourly rates and the time expended by S&S, the value of the services rendered by S&S during the First Interim Fee Period was \$21,283.50. In addition, S&S incurred reasonable and necessary costs of \$0.00, for an aggregate total of \$21,283.50 earned by S&S during the First Interim Fee Period (the "First Interim Fee Request").

6. S&S has not previously applied for compensation in this case.

#### **Services Performed**

7. During the First Interim Fee Period, S&S represented the Debtors with regard to claims asserted against Mr. Charmoli by former patients. S&S assisted the Debtors' general bankruptcy counsel with gathering a list of former patients to be included on amended Schedule F, met and corresponded with counsel for the former patients, assisted bankruptcy counsel in preparing mediation procedures, and began reviewing patient files to determine the merits of potential claims from plaintiffs in the underlying state court cases. In addition, given their previous experience representing the Mr. Charmoli in the underlying state court case, S&S

reviewed and commented on Mr. Charmoli's notice of removal and his objection to the motion for remand and motion for relief from the automatic stay, and attended the February 1, 2023 hearing.

8. Detailed time records of the First Interim Fee Period are attached to this First Interim Fee Application as Exhibit A.

### **Interim Approval of Fees**

9. This First Interim Fee Application is submitted in conformity with the standards set forth in section 330 of the Bankruptcy Code, which this Court uses in assessing the propriety of attorneys' fees. Those standards include: (A) the time spent on such services; (B) the rates charged for such services; (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under the Bankruptcy Code; (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; (E) with respect to each professional perform, whether the person is board certificate or otherwise has demonstrated skill and experience in the bankruptcy field; and (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under the Bankruptcy Code. *See* 11 U.S.C. § 330(a)(3).

10. S&S has extensive experience providing professional liability defense, including dental malpractice defense services. S&S's rates are in conformity with the rates charged by similarly situated counsel. A list of all attorneys, professionals, and paraprofessionals performing services on this case, along with a description of their experience, length of professional practices, and billing rates is attached hereto as Exhibit B.

11. A summary of the compensation requested herein regarding each of S&S's professionals and paraprofessionals is set forth below:

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
W. Patrick Sullivan	Partner	\$240.00	15.50	\$3,720.00
		\$225.00	30.00	\$6,750.00
Ellison F. Hitt	Associate	\$200.00	22.50	\$4,500.00
		\$195.00	19.70	\$3,841.50
		\$80.00	2.20	\$176.00
Daniel Sawall	Law Clerk	\$80.00	28.70	\$2,296.00
<b>Total</b>			<b>118.60</b>	<b>\$21,283.50</b>
			<b>Blended Rate</b>	<b>\$179.46</b>

12. S&S used the skill required to perform the legal services properly, provided the services necessary to its representation of the Debtors' interest in the case, and performed the services within a reasonable amount of time commensurate with the complexity, importance, and nature of each task. Under these standards, the reasonable value of the services rendered by S&S as special counsel for the Debtors throughout the First Interim Fee Period is \$21,283.50, representing \$21,283.50 in fees plus \$0.00 of reasonable and necessary costs.

13. S&S consistently and consciously makes every reasonable effort to represent the Debtors in the most economical, efficient, and practical manner possible. To that end, S&S has made every effort to avoid having multiple attorneys perform the same or similar tasks. However, there are instances where multiple timekeepers billed for performing the same task, such as two attorneys attending conference calls or revising pleadings. In those events, multiple timekeepers were necessary because the different timekeepers have different knowledge bases and because S&S allocates different responsibilities to different attorneys. For certain conference calls, in recognition that multiple timekeepers were present, S&S discounted the rate charged for the junior attorney.

14. In addition, S&S timekeepers occasionally participated in conference calls with other legal professionals employed by the Debtors' bankruptcy estate. S&S submits that these calls were necessary and appropriate to coordinate services and ensure consistent advocacy in contested matters, adversary proceedings, or other filings.

15. Local Rule 2016(c) requires that "applications for interim compensation must include sufficient information to demonstrate that an allowance of interim compensation will not create an undue hardship on the debtor or the estate." S&S does not currently hold any funds in trust. Upon approval of the First Interim Fee Application, S&S work with the Debtors, and other professionals, to arrange for payment over a period of time that ensures that the Debtors have sufficient cash flow and liquidity to manage their affairs.

#### **Payment of Compensation**

16. S&S respectfully requests that the Court authorize payment of any approved compensation in this First Interim Fee Application.

17. S&S provided an itemization of the fees and costs to Debtor, and Debtor has no objection to said fees and costs.

18. All services for which compensation is requested by S&S were performed for, or on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

19. There is no agreement or understanding between the Debtors and any other person, other than principals of S&S, for the sharing of compensation to be received for services rendered in this case.

20. S&S certifies that it has generally complied with the guidelines set forth by the United States Trustee concerning fee applications.

WHEREFORE, Siesennop & Sullivan, LLP respectfully requests that the Court enter an order:

- A. Approving, on an interim basis and pursuant to 11 U.S.C. §§ 330 and 331, compensation of \$21,283.50, representing \$21,283.50 in fees and \$0.00 in reasonable and necessary costs, as an administrative expense pursuant to 11 U.S.C. § 503(b).
- B. Authorizing payment of \$21,283.50, representing the balance due and owing.
- C. Granting such other relief as the Court deems just and appropriate.

Dated: February 14, 2023.

SIESENNOP & SULLIVAN, LLP

By: /s/ W. Patrick Sullivan  
W. Patrick Sullivan  
Ellison F. Hitt  
1017 W. Glen Oaks Lane, Suite 201  
Mequon, WI 53092  
Tel: (414) 223-7900; Fax: (414) 223-1199  
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UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re:

Scott W. Charmoli and  
Lynne M. Charmoli,  
Debtors.

Case No. 22-24358-gmh  
Chapter 11 (Subchapter V)

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EXHIBIT A  
SUMMARY OF FEE REQUEST AND  
PROJECT BILLING DETAILS FOR FIRST INTERIM FEE PERIOD

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Attached hereto is a detailed summary of the attorney fees and costs incurred in this matter, broken down by matter type, during the time period from October 3, 2022 through January 31, 2023 (the "First Interim Fee Period").

Siesennop & Sullivan, LLP  
111 W. Pleasant Street, Suite 110  
Milwaukee, WI 53212  
414-223-7900

Tax I.D. #81-0546355

Charmoli Scott DDS  
565 Cottonwood Lane  
Grafton WI 53024

Page: 1  
February 09, 2023  
Account No: 20879-20879  
Invoice No. 159728

Charmoli - Bankruptcy Issues

**Professional Services**

					<b><u>Rate</u></b>	<b><u>Hours</u></b>	
10/04/2022	WPS	L240	A104	Review/analyze Aspen's Motion to Dismiss or MSJ and supporting Affidavit.	225.00	1.00	225.00
10/10/2022	WPS	L120	A107	Communicate (other outside counsel) - Conference call with Atty. W. re: Chapter 5 strategies re: defending damage claims.	225.00	0.30	67.50
	EFH	L120	A107	Communicate (other outside counsel) - Telephone call with co-counsel RE: status of matters (billed at paralegal rate)	80.00	0.30	24.00
10/12/2022	EFH	L120	A107	Communicate (other outside counsel) - Email to co-counsel RE: motion on protective order	195.00	0.10	19.50
	EFH	L120	A107	Communicate (other outside counsel) - Telephone call with co-counsel RE: patient list	195.00	0.10	19.50
10/17/2022	WPS	L210	A103	Draft/revise - Final review/modification to our Answer and Affirmative Defenses to JFD's Cross-Claim.	225.00	0.20	45.00



## Charmoli - Bankruptcy Issues

					<u>Rate</u>	<u>Hours</u>	
	EFH	L120	A107	Communicate (other outside counsel) - Email to bankruptcy atty RE: obtaining names for mailing notice	195.00	0.10	19.50
	EFH	L120	A106	Communicate (with client) - Emails to client RE: obtaining computer for patient info	195.00	0.20	39.00
10/18/2022	EFH	L120	A107	Communicate (other outside counsel) - Email to bankruptcy attorney RE: pulling patient list	195.00	0.10	19.50
10/21/2022	LC1	L110	A103	Transferred patient data from Open Dental to Excel for bankruptcy preparations	80.00	8.30	664.00
10/24/2022	LC1	L110	A103	Transferred patient data from Open Dental to Excel for bankruptcy preparations	80.00	1.60	128.00
	LC1	L110	A103	Finished transferring patient data from Open Dental to Excel for bankruptcy preparations	80.00	1.80	144.00
10/25/2022	EFH	L120	A106	Communicate (with client) - Email to client RE: concern with patient list numbers, other practice	195.00	0.20	39.00
	EFH	L120	A107	Communicate (other outside counsel) - Emails to co-counsel, client RE: patient numbers, dates, Hartford practice	195.00	0.40	78.00
10/26/2022	EFH	L120	A107	Communicate (other outside counsel) - Emails to bankruptcy RE: telephone call 10/27	195.00	0.20	39.00
10/27/2022	EFH	L120	A107	Communicate (other outside counsel) - Telephone call with			

## Charmoli - Bankruptcy Issues

					<u>Rate</u>	<u>Hours</u>	
				bankruptcy attorney, client RE: data pull, dates of patients	195.00	0.40	78.00
	EFH	L120	A107	Communicate (other outside counsel) - Email to bankruptcy attorney RE: dates for patients	195.00	0.10	19.50
	EFH	L120	A107	Communicate (other outside counsel) - Email to client RE: dates for patients	195.00	0.10	19.50
10/28/2022	LC1	L110	A103	Reduce patient data list to only patients seen between Jan 1, 2015 - Aug, 7, 2019	80.00	4.90	392.00
10/31/2022	EFH	L120	A107	Communicate (other outside counsel) - Email to bankruptcy attorneys RE: data pull	195.00	0.10	19.50
	LC1	L110	A103	Transferred patient data from Hartland location to Excel for bankruptcy preparations	80.00	2.40	192.00
	WPS	L120	A104	Review/analyze - Prep for status conference with Judge Kenitz (review all bankruptcy court filings and transactions).	225.00	0.60	135.00
11/04/2022	WPS	L120	A107	Communicate (other outside counsel) - Met with Attys. N. and W. re: immediate future plan of action.	225.00	2.00	450.00
	WPS	L120	A104	Review/analyze - Review court filings and correspondence from Atty. Nowak re: status in preparation for meeting with he and Atty. W. re: future plan of action.	225.00	0.50	112.50
	EFH	L120	A107	Communicate (other outside counsel) - Meet with co-counsel,			

## Charmoli - Bankruptcy Issues

					<u>Rate</u>	<u>Hours</u>	
				discuss status of resolution of claims (billed at paralegal rate)	80.00	1.50	120.00
	LC1	L120	A107	Communicate (other outside counsel) - Meeting with bankruptcy attorneys	80.00	1.40	112.00
11/07/2022	WPS	L250	A104	Review/analyze - Review Order appointing S&S "special Counsel" for bankruptcy.	225.00	0.20	45.00
11/08/2022	EFH	L120	A107	Communicate (other outside counsel) - Email to all counsel RE: t/c to discuss MSJ filed by Dr. Major	195.00	0.10	19.50
	WPS	L240	A104	Review/analyze - Review/analysis of Major's MSJ.	225.00	0.50	112.50
11/09/2022	EFH	L120	A109	Appear for/attend - Telephone call with co-counsel RE: MSJ hearing	195.00	0.50	97.50
	EFH	L230	A107	Communicate (other outside counsel) - Email to co-counsel re: hearing info (billed at paralegal rate)	80.00	0.10	8.00
	WPS	L120	A107	Communicate (other outside counsel) - Conference call with Attys. McKinley and Swanson re: strategy for MSJ by Major and status conference with Judge 11/16/22.	225.00	0.50	112.50
11/15/2022	WPS	L120	A104	Review/analyze - Prepare for meeting with all Plaintiffs' counsel and co-defense counsel re: Chapter 11 proceeding and future action.	225.00	1.50	337.50
11/16/2022	WPS	L120	A107	Communicate (other outside			

## Charmoli - Bankruptcy Issues

				<u>Rate</u>	<u>Hours</u>	
			counsel) - Met with all counsel re: Chapter 11 procedures.	225.00	1.20	270.00
	WPS	L120	A104 Review/analyze - Completed preparation for meeting with all counsel re: Chapter 11 proceedings.	225.00	1.50	337.50
	LC1	L120	A105 Communicate (in firm) - Discussed the meeting between the bankruptcy attorneys, plaintiff attorneys, insurance, and other parties regarding settling this case	80.00	0.40	32.00
11/17/2022	EFH	L120	A107 Communicate (other outside counsel) - Email to co-def re: date of Dr. Major letter	195.00	0.20	39.00
11/18/2022	WPS	L120	A103 Draft/revise - Email to Atty. Thomsen re: exchange of patient records.	225.00	0.20	45.00
	WPS	L120	A104 Review/analyze - Review 1188(c) and prehearing draft\reports.	225.00	0.30	67.50
11/21/2022	EFH	L120	A107 Communicate (other outside counsel) - Email to all counsel RE: e-signature on stipulation for protective order	195.00	0.10	19.50
11/23/2022	WPS	L120	A103 Draft/revise - 2nd Email to Atty. T. re: copies of Plaintiff's records for comparison.	225.00	0.20	45.00
	EFH	L250	A107 Communicate (other outside counsel) - Email to co-counsel RE: service	195.00	0.10	19.50
11/30/2022	EFH	L120	A107 Communicate (other outside counsel) - Telephone call with co-counsel RE: litigations			

## Charmoli - Bankruptcy Issues

				<u>Rate</u>	<u>Hours</u>	
			schedule for bankruptcy	195.00	0.30	58.50
	EFH	L250	A104 Review/analyze - Review bankruptcy filings	195.00	1.00	195.00
	WPS	L120	A104 Review/analyze - review proposed procedures/plan re: Chapter 11 proceedings and phone conference with Atty. Nowak re: suggested modifications.	225.00	1.00	225.00
	EFH	L120	A107 Communicate (other outside counsel) - Telephone call with co-counsel RE: litigations schedule for bankruptcy (billed at paralegal rate)	80.00	0.30	24.00
	EFH	L250	A104 Review/analyze - Review bankruptcy filings	195.00	1.00	195.00
12/01/2022	WPS	L120	A107 Communicate (other outside counsel) - Conference call with Attys. Swanson and Nowak re: their preparation for Chapter 11 Scheduling Conference with Judge Helfinger tomorrow.	225.00	0.50	112.50
12/15/2022	EFH	L120	A107 Communicate (other outside counsel) - Telephone call with co-counsel RE: questions on reviewing charts	195.00	0.20	39.00
	EFH	L120	A104 Review/analyze - Begin review of files for patients:	195.00	5.00	975.00
	WPS	L120	A104 Review/analyze - Work on system to categorize claims re: value and defensibility.	225.00	0.40	90.00
12/16/2022	EFH	L120	A104 Review/analyze - Begin review of files for patients:	195.00	4.50	877.50

## Charmoli - Bankruptcy Issues

					<u>Rate</u>	<u>Hours</u>	
	EFH	L120	A106	Communicate (with client) - Telephone call with client RE: open dental, apertyx questions, organization, reimbursement from gov't for restitution	195.00	0.70	136.50
12/17/2022	WPS	L120	A104	Review/analyze - Initial review/analysis of available dental records, x-rays, IOPs of Heidi DuBord re: defensibility of case.	225.00	2.30	517.50
	WPS	L120	A104	Review/analyze - Initial review/analysis of records available re: defensibility of Eugene Reese case.	225.00	2.00	450.00
12/18/2022	WPS	L120	A104	Review/analyze - Initial review/analysis of records, x-rays, IOPs available for Jerome Roskopf re: defensibility of case.	225.00	0.70	157.50
	WPS	L120	A104	Review/analyze - Initial review/analysis of available dental records/x-rays/IOPs of Heather Fergus re: defensibility of case.	225.00	1.00	225.00
	WPS	L120	A104	Review/analyze - Initial review/analysis of available dental records, x-rays, IOPs of Jackie B. re: defensibility of case.	225.00	1.50	337.50
12/19/2022	EFH	L120	A104	Review/analyze - Reviewing/organizing plaintiff cases	195.00	3.80	741.00
	WPS	L120	A104	Review/analyze - Review/analysis of Pleadings and Stipulation re: DJ against Aspen for defense/indemnity coverage.	225.00	0.50	112.50

## Charmoli - Bankruptcy Issues

					<u>Rate</u>	<u>Hours</u>	
12/20/2022	WPS	L120	A104	Review/analyze - Initial review/analysis of available records, x-rays and IOPs re: defensibility of Karen Sinclair's claim.	225.00	2.80	630.00
	WPS	L120	A104	Review/analyze - Initial review/analysis of available records, x-rays and IOPs to evaluate Shelley Wicke's claim/defensibility.	225.00	1.80	405.00
	WPS	L120	A104	Review/analyze - Initial evaluation of available records, x-rays, IOPs to evaluate defensibility of Jenna Carlin's claim.	225.00	1.20	270.00
	WPS	L120	A104	Review/analyze - Initial review of available records, x-rays, IOPs re: evaluation of Susan Chapman's claim.	225.00	1.00	225.00
12/23/2022	WPS	L120	A104	Review/analyze - Review available chart records re: defensibility of D. Wiesman claim.	225.00	2.30	517.50
12/27/2022	WPS	L120	A107	Communicate (other outside counsel) - Call from Peter N. re: Chapter 11 procedural issues.	225.00	0.30	67.50
12/29/2022	EFH	L120	A107	Communicate (other outside counsel) - Email to co-counsel RE: notice of removal	195.00	0.10	19.50
01/11/2023	EFH	L120	A107	Communicate (other outside counsel) - Telephone call with all counsel RE: Aspen dispute, bankruptcy schedule	200.00	0.70	140.00

## Charmoli - Bankruptcy Issues

				<u>Rate</u>	<u>Hours</u>	
	LC1	L110	A102	Research - Review the patients who could not get letters sent to them and determine which patients received crowns from Charmoli after 2016	80.00	5.00 400.00
	WPS	L120	A104	Review/analyze - Review K. Amundson chart re: analysis of defensibility/damages.	240.00	1.80 432.00
	WPS	L120	A104	Review/analyze - Review L. Ehlke chart re: analysis of defensibility/damages.	240.00	1.70 408.00
	WPS	L120	A107	Communicate (other outside counsel) - Conference call with attorneys re: Ch. 11 status and strategies re: pending motions/issues.	240.00	0.70 168.00
	EFH	L120	A104	Review/analyze - Review/Organize patient files - Ogorchock cases	200.00	3.00 600.00
01/12/2023	LC1	L110	A102	Research - Review the patients who could not get letters sent to them and determine which patients received crowns from Charmoli after 2016	80.00	1.70 136.00
	LC1	L140	A110	Manage data/files - Organize additional patient file copy	80.00	1.20 96.00
	EFH	L120	A104	Review/analyze - Continue Review/Organize patient files - Ogorchock cases	200.00	3.00 600.00
01/13/2023	EFH	L120	A104	Review/analyze - Continue Review/Organize patient files - Ogorchock cases	200.00	4.00 800.00
01/16/2023	EFH	L120	A104	Review/analyze -		



## Charmoli - Bankruptcy Issues

				<u>Rate</u>	<u>Hours</u>	
			Review/Organize - patient files - Mary Glocke	200.00	1.00	200.00
	EFH	L120	A107 Communicate (other outside counsel) - Email to bankruptcy counsel RE: unknown address lists	200.00	0.20	40.00
01/18/2023	WPS	L120	A104 Review/analyze - Review/analysis Caitlin Lamb's records re: defensibility of treatment re: her Chapter 11 claim.	240.00	0.60	144.00
	WPS	L120	A104 Review/analyze - Review/analysis of records for May Glocke re: defensibility of Ch. 11 claim.	240.00	1.70	408.00
	WPS	L120	A104 Review/analyze - Review/analysis of S. Pietrowski records re: defensibility of claim in Chapter 11.	240.00	0.40	96.00
01/21/2023	WPS	L120	A104 Review/analyze - Review/analysis of J. Schuster's chart re: defensibility of Ch. 11 claim.	240.00	0.90	216.00
	WPS	L120	A104 Review/analyze - Review/analysis of H. Anders chart re: defensibility of Chapter 11 claim.	240.00	1.20	288.00
	WPS	L120	A104 Review/analyze - Review/analysis of P. Pryor's chart re: defensibility of Ch. 11 claim.	240.00	1.00	240.00
	WPS	L200	A104 Review/analyze - Review/analysis of M. Vonwerk's chart re: defensibility			

## Charmoli - Bankruptcy Issues

					<u>Rate</u>	<u>Hours</u>	
				of Ch. 11 claim.	240.00	1.00	240.00
01/23/2023	EFH	L120	A104	Review/analyze - Review files with WPS to assess valuation	200.00	3.50	700.00
	WPS	L120	A104	Review/analyze - Evaluate 9 cases for damages range re: mediation position.	240.00	4.00	960.00
01/26/2023	EFH	L120	A107	Communicate (other outside counsel) - Email to co-counsel RE: Telephone call to discuss hearing for following week	200.00	0.10	20.00
	EFH	L120	A107	Communicate (other outside counsel) - Telephone call with co-counsel RE: hearing	200.00	0.40	80.00
	WPS	L120	A107	Communicate (other outside counsel) - Conference call with Atty. Nowak re: hearing in Ch. 11 re: Pako Major motion to remove to state court.	240.00	0.50	120.00
01/30/2023	EFH	L120	A104	Review/analyze - Start review of civil case - Charmoli v. Major, in preparation for 2/1 hearing.	200.00	2.00	400.00
01/31/2023	EFH	L230	A101	Plan and prepare for - Prep for bankruptcy hearing	200.00	4.10	820.00
	EFH	L120	A107	Communicate (other outside counsel) - Emails to co-counsel RE: prep for bankruptcy hearing	200.00	0.20	40.00
	EFH	L120	A107	Communicate (other outside counsel) - Telephone call with co-counsel RE: bankruptcy hearing prep	200.00	0.30	60.00
				For Professional Services Rendered		118.60	21,283.50

Charmoli - Bankruptcy Issues

**USER SUMMARY**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
W. Patrick Sullivan	30.00	\$225.00	\$6,750.00
W. Patrick Sullivan	15.50	240.00	3,720.00
Law Clerk 1	28.70	80.00	2,296.00
Ellison F. Hitt	2.20	80.00	176.00
Ellison F. Hitt	19.70	195.00	3,841.50
Ellison F. Hitt	22.50	200.00	4,500.00

Total Current Work	21,283.50
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<b>BALANCE DUE</b>	<b><u>\$21,283.50</u></b>
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**Task Code Summary**

	<u>Fees</u>	<u>Expenses</u>
L110 Fact Investigation/Development	2056.00	0.00
L120 Analysis/Strategy	17226.50	0.00
L140 Document/File Management	96.00	0.00
L100 Case Assessment, Development and Administration	19,378.50	0.00
L200 Pre-Trial Pleadings and Motions	240.00	0.00
L210 Pleadings	45.00	0.00
L230 Court Mandated Conferences	828.00	0.00
L240 Dispositive Motions	337.50	0.00
L250 Other Written Motions and Submissions	454.50	0.00
L200 Pre-Trial Pleadings and Motions	1,905.00	0.00

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re:

Scott W. Charmoli and  
Lynne M. Charmoli,  
Debtors.

Case No. 22-24358-gmh  
Chapter 11 (Subchapter V)

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EXHIBIT B  
SUMMARY OF PROFESSIONALS

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The following is a list of all attorneys, professionals, paraprofessionals, or other timekeepers performing services on the case long with a description of the experience, length of professional practice, and billing rate for each:

**W. Patrick Sullivan**  
**Partner, Admitted in 1984**  
**\$225-240 per hour**

Attorney Sullivan is a founding partner of Siesennop & Sullivan, LLP, a law firm that primarily represents licensed professionals against claims involving negligence/malpractice or who face disciplinary or licensing issues with their respective professional boards. He received his undergraduate degree from Tufts University, a master's degree from Columbia University, and his law degree from Marquette University, where he was a member of the moot court team.

**Ellison F. Hitt**  
**Associate, Admitted in 2012**  
**\$195-200 per hour**

Attorney Hitt is an associate at Siesennop & Sullivan, LLP. She received her undergraduate degree from Miami University and her law degree from Marquette University, where she was a member of the Health Law Society and Association of Women Lawyers.

**Daniel Sawall**  
**Law Clerk**  
**\$80 per hour**

Mr. Sawall is a third-year law student at Marquette University. He received his undergraduate degree from Marquette University.